

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

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|---------------------------------------|-----------------------------------|
| RANDEL EDWARD PAGE, JR. |) |
| |) |
| Plaintiff, |) |
| |) |
| v. |) Case No. 3:23-cv-00851 |
| |) |
| UNITED STATES OF AMERICA; |) JUDGE CAMPBELL |
| STATE OF TENNESSEE; EPIC |) MAGISTRATE JUDGE NEWBERN |
| SYSTEMS CORPORATION, ET AL.; |) |
| CORVEL CORPORATION, ET AL.; |) |
| BAPTIST MEMORIAL HEALTH CARE |) |
| CORPORATION, ET AL.; METHODIST |) |
| LE BONHEUR HEALTHCARE, ET AL.; |) |
| THE WEST CLINIC, PLLC, ET AL., |) |
| |) |
| Defendants. |) |
| |) |

**DEFENDANT METHODIST LE BONHEUR HEALTHCARE'S
RESPONSE TO PLAINTIFF'S OBJECTIONS TO MAGISTRATE JUDGE'S REPORT
AND RECOMMENDATION**

Defendant Methodist Le Bonheur Healthcare ("Methodist"), in response and opposition to the Plaintiff's Objections to the Magistrate Judge's Report and Recommendation (ECF No. 50), states that Plaintiff's objections are improper, as they are conclusory and fail to address or identify "portions of the report or specified proposed findings or recommendations to which objection is made." 28 U.S.C. § 636(b)(1)(C). *See also Adams v. Yates Servs. Nissan*, No. 3:15-CV-00490, 2016 WL 2607028, at *1 (M.D. Tenn. May 6, 2016) (quoting *Cole v. Yukins*, 7 Fed.Appx. 354, 356 (6th Cir. 2001) ("The filing of vague, general, or conclusory objections does not meet the requirement of specific objections and is tantamount to a complete failure to object.")); *see also*

Howard v. Sec'y of Health & Human Servs., 932 F.2d 505 509 (6th Cir. 1991) (“A general objection to the entirety of the magistrate’s report has the same effects as would a failure to object[.]”).

The deficiencies of Plaintiff’s objections are detailed in Responses already before this Court. Accordingly, Methodist, pursuant to Rule 10(c) of the Federal Rules of Civil Procedure, adopts and incorporates by reference the law and arguments set forth in the Response filed by Baptist Memorial Healthcare Corporation (ECF No. 51), and the Response filed by The West Clinic, PLLC (ECF No. 53).

For the reasons set forth and incorporated by reference herein by Methodist, the Court should accept Magistrate Judge Newbern’s Report and Recommendation and dismiss Plaintiff’s claims against Methodist.

Respectfully submitted,

s/Buckner Wellford

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of July, 2024, a true and exact copy of the forgoing document was served on all counsel of record via the Court's electronic filing system.

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I also hereby certify that a true and exact copy of the forgoing document was served via U.S. Mail on the following individuals:

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s/ Buckner Wellford
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